

1 SERVICES UNLIMITED, a for-profit Washington sole proprietorship. Defendants directed,
2 controlled, formulated and carried out the acts, practices and activities that are the subject of
3 this Complaint.

4 2.2 All defendants reside and have their primary place of business in Walla Walla
5 County, Washington. The violations hereinafter alleged have been committed in whole or in
6 part within Walla Walla County and elsewhere within the State of Washington by the
7 Defendants.

8 2.3 The Attorney General's standing to commence this action is conferred by
9 RCW 19.86.080 and 19.154.090.

10 2.4 Jurisdiction over the Defendants is vested in this Court because Defendants
11 have committed the acts alleged below in the State of Washington. Jurisdiction over the
12 subject matter of this Complaint is conferred by the above-referenced statutes.

13 III. NATURE OF TRADE OR COMMERCE

14 3.1 Defendants, during the time period relevant to this action, engaged in the for-
15 profit business of immigration assistance. Defendants use unfair and deceptive acts and
16 practices in the course of providing immigration-related services to Washington consumers,
17 including by failing to provide the contractual terms and disclosures and the cancellation rights
18 mandated by the Immigration Assistant Practices Act (IAA), RCW 19.154. As such,
19 Defendants are engaged in trade or commerce within the meaning of RCW 19.86.020.

20 IV. BACKGROUND FACTS

21 4.1 Defendants have engaged in the unauthorized practice of law by providing legal
22 advice and services regarding applications for visas or other immigration or citizenship status.

23 4.2 Defendants have provided immigration assistance without providing the written
24 contract and disclosures required by the Immigration Assistant Practices Act (IAA),
25 RCW 19.154.

1 4.3 Defendants have failed to inform consumers in writing of their right to cancel
2 their transaction. RCW 19.154.070(4).

3 4.4 Defendants have given inaccurate legal advice and injurious services to
4 consumers resulting in substantial prejudice to the consumers' ability to obtain immigration
5 benefits they might otherwise have qualified for and subjecting them to possible denial of legal
6 status, fees, removal (deportation) and criminal liability.

7 4.5 Defendants have charged fees for inaccurate advice and harmful services.

8 4.6 Defendants have used titles or references such as "notary public" and
9 "immigration consultant" that indicate special professional skills or expertise, which titles are
10 prohibited by the IAA. RCW 19.154.080.

11 4.7 Defendants have advertised or failed to correct advertising that lists their
12 business as a law office or one capable of providing "legal services" when not actually licensed
13 to practice law.

14 4.8 Each of the allegations in this Complaint refer back to conduct that has
15 occurred. Plaintiff alleges that the described conduct is a material part of Defendants' business
16 practices and is continuing or will continue unless enjoined or restrained by order of the Court.

17 **V. FIRST CAUSE OF ACTION**
18 **Misrepresentations**

19 5.1 Plaintiff re-alleges paragraphs 1.1 through 4.8, inclusive and incorporates them
20 herein by this reference.

21 5.2 In the context of conducting their business Defendants made numerous
22 misrepresentations. Such conduct constitutes unfair or deceptive acts or practices in trade or
23 commerce, and/or unfair methods of competition in violation of RCW 19.86.020.

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**VI. SECOND CAUSE OF ACTION
Unfair Practices**

6.1 Plaintiff re-alleges paragraphs 1.1 through 5.2, inclusive and incorporates them herein by this reference.

6.2 In the context of conducting their business, Defendants engaged in numerous unfair acts and practices. Such conduct constitutes unfair or deceptive acts or practices in trade or commerce, and/or unfair methods of competition in violation of RCW 19.86.020.

**VII. THIRD CAUSE OF ACTION
Violations of the Immigration Assistant Practices Act, RCW 19.154**

7.1 Plaintiff re-alleges paragraphs 1.1 through 6.2, inclusive and incorporates them herein by this reference.

7.2 In the context of conducting their business, Defendants created and enforced agreements that violate the IAA, failed to provide written notice of a consumer's right to cancel the transaction, provided legal services forbidden by the IAA, and used prohibited titles or references in advertising or solicitations.

7.3 Pursuant to RCW 19.154.090, violations of the Immigration Assistant Practices Act are *per se* violations of the Consumer Protection Act, RCW 19.86.

7.4 Notwithstanding RCW 19.154.090, Defendants' conduct affects the public interest and has the capacity to mislead a substantial number of consumers and constitutes unfair or deceptive acts or practices in trade or commerce and unfair methods of competition in violation of RCW 19.86.020.

VIII. PRAYER FOR RELIEF

WHEREFORE, the State moves the Court for:

8.1 That the Court adjudge and decree that Defendants have engaged in the conduct complained of herein.

8.2 That the Court adjudge and decree that the conduct complained of in the above causes of action constitutes violations of RCW 19.86.020.

